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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 WALTER SPURLOCK and ANDRE
14 GUIBERT,

15 Plaintiffs,

16 v.

17 CITY AND COUNTY OF SAN
FRANCISCO, AIRPORT COMMISSION OF
18 THE CITY AND COUNTY OF SAN
FRANCISCO, KEABOKA MOLWANE in his
19 individual capacity and official capacity as
Aviation Security and Regulatory Compliance
Officer at the San Francisco International
20 Airport, and JEFF LITTLEFIELD in his
individual capacity and official capacity as
Chief Operating Officer at San Francisco
21 International Airport,
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23 Defendants.

24 Case No. 3:23-cv-4429

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**DECLARATION OF MOLLY J. ALARCON IN
SUPPORT OF DEFENDANTS' REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
MOTION TO DISMISS THE FIRST
AMENDED COMPLAINT**

DECLARATION

I, Molly J. Alarcon, declare as follows:

1. I am an attorney duly licensed to practice law in California, and a Deputy City Attorney for the City and County of San Francisco assigned to represent Defendants the City and County of San Francisco, the Airport Commission of the City and County of San Francisco, Jeff Littlefield, and Doe 1 in the above-captioned case. I have personal knowledge of the matters stated herein and, if called upon, I could and would testify competently to the contents of this Declaration.

2. The Charter of the City and County of San Francisco (the “S.F. Charter”) is a public record made available online in the American Legal Publishing’s Code Library.

³. S.F. Charter Article I, § 1.101 is available at

https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-22#JD_1.101

⁴. S.F. Charter, Article IV, § 4.100 is available at

https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-166

⁵ See Charter Article IV § 4.102 is available at

https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-181

⁶ See Charter Article IV § 4.115 is available at

https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_charter/0-0-0-303

⁷ See Charter Article IV § 4.126 is available at

https://codelibrary.emlegal.com/codes/sen_francoise/latest/sf_charter/0.0.0.366

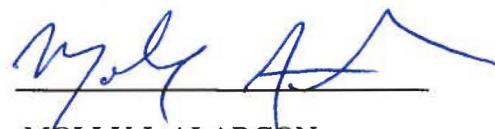
8 True and correct copies of these provisions. S

IV-88-4-100-4-102-4-115 - 14-126 - 4-1-11 - 4 - Exhibit A

Revoked Identification Media TSA-NA-21-01A.” FAC at ¶ 53. This is not a publicly available document because it is “sensitive security information” (“SSI”) not subject to public disclosure under federal regulations. 49 C.F.R. § 1520.5(a), (b)(1), and (b)(2). The Airport has a copy of this document, which will be filed under seal as **Exhibit B** to this Declaration, to allow for in-camera review by the Court.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct.

3 Executed this 18th day of December, 2023 in San Francisco, California.
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7 MOLLY J. ALARCON

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